

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

IN RE:	}	
TOMMY L. MOORE, and	}	CASE NO. 13-51498
VIRGINIA MOORE	}	CHAPTER 11
DEBTORS	}	JUDGE RONALD B. KING

DEBTORS' EMERGENCY MOTION FOR INTERIM AND FINAL ORDER FOR  
AUTHORITY TO USE CASH COLLATERAL

The debtor in possession, by their attorney, represents as follows:

1. On June 3, 2013, the Debtors filed a voluntary petition initiating this Chapter 11 case and desire to continue operating their business as a debtor in possession.

2. By this motion the Debtors seeks authority to use case collateral in the amount of \$25,000.00. The cash collateral sought to be used consists of funds on deposit in an account with FROST NATIONAL BANK and also accounts receivables.

3. The name and address of each entity having an interest in the cash collateral sought to be used is: a.) FROST NATIONAL BANK, P.O. Box 1600, San Antonio, Texas 78296.

The name and address of persons having possession of the cash collateral sought to be used is TOMMY L. MOORE, and VIRGINIA MOORE, 8751 Tradewind, San Antonio, Texas 78239.

4. The Debtors need to use the cash collateral described above in this motion in order to meet its payroll, pay taxes and to purchase inventory and supplies needed in the operation of their business. The Debtors have no other funds with which to pay such expenses and if such expenses are not paid the Debtors will be unable to continue the business operations. This motion is filed in an abundance of caution with notice to other creditors.

5. The Debtors proposes to protect the interests of FROST NATIONAL BANK in the cash collateral sought to be used, with a lien on post-petition proceeds and an administrative claim as first lien holder. This offer has been provided to First National Bank representatives.

6. The Debtors hereby requests a preliminary hearing on this motion. The protection to be provided pending final hearing is listed in paragraph 5.

WHEREFORE, the Debtors pray for the entry of an order authorizing the Debtors to use cash collateral in the amount and in the manner described above in this motion and for such other relief as may be just and proper.

Dated: June 12, 2013

Johnny W. Thomas, Law Office, P.C.

By: \_\_\_\_\_ / S /

Johnny W. Thomas  
Attorney for Debtor in Possession  
1153 E. Commerce  
San Antonio, TX 78205  
(210) 226-5888  
Fax: (210) 226-6085

Certificate of Service

The undersigned certifies under penalty of perjury that he has on the date shown below, by first class mail addressed to their respective addresses of record in this case, transmitted and served a true copy of this document to the United States Trustee and parties listed on the attached matrix.

Tommy L. Moore  
Virginia Moore  
8751 Tradewind  
San Antonio, Texas 78239

Frost National Bank  
P.O. Box 1600  
San Antonio, TX 78296

Sterling Bank/Houston  
P.O. Box 40333  
Houston, Texas 77240

Internal Revenue Service  
8700 Tesoro Dr.  
Stop 6610 SANC  
San Antonio, Texas 78217

Date: June 12, 2013

\_\_\_\_\_  
/ S /  
Johnny W. Thomas  
Attorney for Debtor in Possession